

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
at BALTIMORE**

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| In re: | : | |
| SCOTT A. MASON | : | CASE NO. <u>18-22014</u> |
| | : | |
| GRACE K. MASON | : | CHAPTER 13 |
| | : | |
| Debtor(s) | : | |
| <hr/> | : | |

**MOTION TO CONVERT
CASE UNDER CHAPTER 13
TO CASE UNDER CHAPTER 7**

Pursuant to 11 U.S.C. § 1307(a), Scott A. Mason and Grace K. Mason, the Debtor(s), requests this court to convert their case under Chapter 13 to a case under Chapter 7, and as grounds states as follows:

1. The Debtors filed for relief under Chapter 13 of the Bankruptcy Code on September 10, 2018, The confirmation hearing for their Plan is scheduled for January 8, 2019.
2. Plan payments in this matter were proposed at \$200.00 for the first month, and \$329.00 monthly thereafter. While these amounts may seem modest, the Debtors have been struggling to make even the first payment.
3. Debtor Scott Mason has had a reduction in income, which negatively impacts the household budget and the Debtors' ability to comply with the requirements of their Chapter 13 proceeding.
4. The ability to obtain a replacement job with a higher rate of pay, or the ability to obtain supplemental or additional household income is unlikely at this time.
5. The Debtors have not been able to proportionately reduce monthly expenditures to offset the reduction in income.

Having been fully advised of the difference in the effects of a Chapter 13 discharge and a Chapter 7 discharge, particularly as to secure home mortgage creditors, the Debtors move this Honorable Court to convert this case to a proceeding under Chapter 7 of the Bankruptcy Code.

Date: December 12, 2018

Respectfully submitted,

/s/ Ann Shaw

Ann Shaw, 09595

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Attorney for Debtor

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of December, 2018, a true and correct copy of the Debtors' Motion to Convert Case Under Chapter 13 to Case Under Chapter 7 was sent by first class mail, proper postage prepaid to the following, as well as all creditors and interested parties on the attached list:

U.S. Department of Justice
Office of the U.S. Trustee
101 W. Lombard Street, Suite 2625
Baltimore, MD 21201

Robert S. Thomas, II
Chapter 13 Trustee
300 E. Joppa Road, Suite #409
Towson, MD 21286

/s/ Ann Shaw

Ann Shaw, 09595

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